

1 Ira M. Levin  
 2 [ilevin@burkelaw.com](mailto:ilevin@burkelaw.com), *pro hac vice*  
 3 Danielle J. Gould  
 4 [dgould@burkelaw.com](mailto:dgould@burkelaw.com), *pro hac vice*  
 5 Joshua J. Cauhorn  
 6 [jcauhorn@burkelaw.com](mailto:jcauhorn@burkelaw.com), *pro hac vice*  
 7 BURKE, WARREN, MACKAY & SERRITELLA, P.C.  
 8 330 North Wabash Avenue, 21st Floor  
 Chicago, Illinois 60611  
 Telephone: 312.840.7000  
 Facsimile: 312.840.7900  
 9 *Attorneys for Plaintiffs*  
 10 ICONIC MOTORS, INC. d/b/a ELGIN VOLKSWAGEN  
 11 SLEVIN CAPITAL INVESTMENTS, INC.

12  
 13  
**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

14 *In re: Volkswagen 'Clean Diesel' Marketing,*  
 15 *Sales Practices, and Products Liability*  
 16 *Litigation*

17 This document relates to:

18 *Iconic Motors, Inc. v. Volkswagen Group of*  
 19 *America, Inc., No. 3:17-cv-3185-CRB*

20 LEAD CASE No. 15-md-02672- CRB

21 **PLAINTIFFS' ADMINISTRATIVE**  
**MOTION TO HAVE EXHIBITS A-D**  
**AND F-G OF DECLARATION OF**  
**WILLIAM A. SLEVIN, GROUP**  
**EXHIBIT E TO OPPOSITION, AND**  
**PORTIONS OF FED. R. CIV. P. 56(d)**  
**DECLARATION TO PLAINTIFFS'**  
**OPPOSITION TO ROBERT BOSCH**  
**GMBH AND ROBERT BOSCH LLC'S**  
**MOTION FOR SUMMARY JUDGMENT**  
**FILED UNDER SEAL PURSUANT TO**  
**CIVIL L.R. 79-5**

22 by Plaintiffs:

23 Iconic Motors, Inc. d/b/a Elgin Volkswagen  
 24 and Slevin Capital Investments, Inc.

25 Hon. Charles R. Breyer

1 Plaintiffs, Iconic Motors, Inc. d/b/a Elgin Volkswagen and Slevin Capital Investments, Inc.,  
2 respectfully move, pursuant to Civil L.R. 7-11 and Civil L.R. 79-5, that the Court enter an order that  
3 Exhibits A-D and Exhibits F-G attached to the Declaration of William A. Slevin (“Slevin  
4 Declaration”), Group Exhibit E, and Portions of the Fed. R. Civ. P. 56(d) Declaration of Joshua J.  
5 Cauhorn (“56(d) Declaration”) attached to Plaintiffs’ Opposition to Robert Bosch GmbH and Robert  
6 Bosch LLC’s Motion for Summary Judgment (the “Opposition”), and any references to them, be  
7 filed under seal pursuant to Civil L.R. 79-5. Plaintiffs have a legitimate private interest that warrant  
8 sealing, will suffer injury if not sealed, and are unaware of a less restrictive alternative. As set forth  
9 in the accompanying Declaration of Joshua J. Cauhorn in Support of Plaintiffs’ Administrative  
10 Motion to Have Exhibits A-D and F-G of Declaration of William A. Slevin, Group Exhibit E, and  
11 Portions of 56(d) Declaration of Joshua J. Cauhorn Attached to Plaintiffs’ Opposition to Robert  
12 Bosch GmbH and Robert Bosch LLC’s Motion for Summary Judgment Filed Under Seal Pursuant  
13 to Civil L.R. 79-5, good cause exists for sealing the Exhibits and excerpts designated therein.

14 Plaintiffs therefore request authority to file under seal the unredacted Opposition,  
15 Declarations, and Exhibits in their entirety, and to file publicly a version of the Opposition and  
16 Declarations that redacts information designated “CONFIDENTIAL” under the Protective Order.  
17 [Dkt. No. 5180.]

18

19

20

21

22

23

24

1 Dated: February 14, 2025

Respectfully submitted,

2 /s/ Joshua J. Cauhorn

3 Ira M. Levin

4 ilevin@burkelaw.com, *pro hac vice*

5 Danielle J. Gould

6 dgould@burkelaw.com, *pro hac vice*

7 Joshua J. Cauhorn

8 jcauhorn@burkelaw.com, *pro hac vice*

9 BURKE, WARREN, MACKAY & SERRITELLA, P.C.

10 330 North Wabash Avenue, 21st Floor

11 Chicago, Illinois 60611

12 Telephone: 312.840.7000

13 Facsimile: 312.840.7900

14 *Attorneys for Iconic Motors, Inc. d/b/a Elgin Volkswagen and*  
15 *Slevin Capital Investments, Inc.*

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that on February 14, 2025, the within document was filed with the Clerk of  
18 Court using CM/ECF which will send notification of such filing to the attorneys of record in this  
19 case.

20 /s/ Joshua J. Cauhorn

21 JOSHUA J. CAUHORN, *pro hac vice*

22 Attorney for Iconic Motors, Inc. d/b/a Elgin  
23 Volkswagen and Slevin Capital Investments,